

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
DIVISION

FILED
2011 APR 20 PM 12:38

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

William H Burse)
)
2404 Alpine Park Ave)
)
William H Burse)
Name of Plaintiff)

v.)

Case No. _____
(To be assigned by Clerk)

Jury Demand ☒ Yes ☐ No

Baptist Hospital)
)
2000 Church St)
)
Nashville Tenn)
Name of Defendant(s))

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964, and the Civil Rights Act of 1991, for employment discrimination. Jurisdiction is specifically conferred upon the Court by 42 U.S.C. § 2000e-5, or, if the Plaintiff is a federal employee, by 42 U.S.C. § 2000e-16. Relief is sought under 42 U.S.C. § 2000e-5(g) and/or 42 U.S.C. § 1981a(b).

2. Plaintiff, William H Burse, is a citizen of the United States and resides at

2404 Alpine Park Ave (B) Nashville
Street address City

DAVIDSON, Tenn, 37218, 615-259-9063
County State Zip Code Telephone Number
615-525-4962

3. Defendant, Baptist Hospital resides at, or its business is located at

200 Church St Nashville
Street address City

DAVIDSON, Tenn, 37236
County State Zip Code

(If more than one Defendant, list the name and address of each additional Defendant)

4. Plaintiff sought employment from the Defendant or was employed by the Defendant at

200 Church Street, Nashville,
 Street address City
DAVIDSON, Tenn, _____
 County State Zip Code

5. Defendant discriminated against Plaintiff in the manner indicated in paragraphs 8 and 9 of this Complaint on or about Oct 28 2009
 Month Day Year

6. Plaintiff filed charges against the Defendant with the Tennessee Human Rights Commission or the Equal Employment Opportunity Commission charging the Defendant with the acts of discrimination indicated in paragraphs 8 and 9 of this Complaint on or about Oct 23 2009.
 Month Day Year

7. The Equal Employment Opportunity Commission or the United States Department of Justice issued a Notice of Right to Sue which was received by Plaintiff on Feb 9-2011
 Month
9 2011, a copy of which Notice is attached.
 Day Year

8. Because of Plaintiff's (1) _____ race, (2) X color, (3) X sex,
 (4) _____ religion, (5) _____ national origin, the Defendant: Age 51

- a. _____ failed to employ Plaintiff.
- b. ☒ _____ terminated Plaintiff's employment.
- c. _____ failed to promote Plaintiff.
- d. ☒ _____ retaliated against Plaintiff for having filed a charge of discrimination.
- e. _____ other. Explain: _____

9. The circumstances under which Defendant discriminated against Plaintiff were as follows:

(You may use additional paper, if necessary.)

10. The acts set forth in paragraph 8 of this Complaint:

- a. _____ are still being committed by Defendant.
- b. ☒ _____ are no longer being committed by Defendant.
- c. _____ may still be being committed by Defendant.

11. Plaintiff attaches to this Complaint a copy of the charges filed with the Tennessee Human Rights Commission or the Equal Employment Opportunity Commission, which charges are submitted as a brief statement of the facts supporting this Complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief:

- a. _____ direct that Defendant employ Plaintiff, or
 b. ☒ direct that Defendant re-employ Plaintiff, or
 c. _____ direct that Defendant promote Plaintiff, or
 d. ☒ order other equitable or injunctive relief: _____

 e. _____ direct that Defendant pay Plaintiff back pay in the amount of
30,000. per year and interest on back pay;

f. ☒ direct that Defendant pay Plaintiff compensatory damages: Specify
 the amount and basis for compensatory damages: ☒

 g. ☒ direct that Defendant pay Plaintiff punitive damages in the amount of
 _____ because Defendant engaged in a discriminatory practice or
 practices with malice or with reckless indifference to Plaintiff's federally protected rights,
 as described in paragraphs 8 and 9 above; and that the Court grant such other relief as may
 be appropriate, including costs and attorney's fees.

William Bune
 (Signature of Plaintiff)